

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

SHARNESE HALL On Her Own Behalf and on Behalf of All Others Similarly Situated,	:	
	:	
	:	
	:	
Plaintiff,	:	Civil Action No. 8:22-cv-00996-BAH
v.	:	
	:	
HWS, LLC t/a	:	
HENRY’S WRECKER SERVICE, <i>et al.</i>	:	
	:	
Defendants.	:	
	:	

**Motion for Final Approval
of Class Action Settlement**

Plaintiff Sharnese Hall (“Representative Plaintiff”), acting individually and on behalf of a Settlement Class of similarly situated persons, respectfully moves for final Court approval of the class-wide settlement which the Court preliminarily approved in this case pursuant to *Fed.R.Civ.P.* 23(e)(1) on February 4, 2025. *See* ECF No. 108, Preliminary Approval Order. The Preliminary Approval Order granted preliminary certification of a settlement class defined as follows:

All consumers on the class list compiled in this case whose vehicles, between March 23, 2019 and December 31, 2023, were non-consensually/trespass towed by Henry’s Wrecker Service from a private Parking Lot in Montgomery County, Maryland, where Henry’s charged or was paid a fee.

ECF No. 106-2, Settlement Agreement ¶ 17 (the “Settlement Class”). Excluded from the Settlement Class are all employees, officers and directors of Defendants HWS, LLC, Henry’s Wrecker Service Company of Fairfax County, Inc. Fred Scheler, Richard Barakat, Joshua Welk, Wheaton Metro Residential Holdings, LLC and Foulger-Pratt Residential, LLC, and all employees of the Court. *Id.* ¶ 3.

Now, pursuant to *Fed.R.Civ.P.* 23(e)(2) and in advance of the final fairness hearing scheduled for 10:00 a.m. on **June 5, 2025**, Representative Plaintiff submits this motion in support of final approval of the Settlement Agreement (ECF No. 106-2),

as the proposed settlement is fair, adequate and reasonable to Settlement Class members, and as the class certification requirements of *Fed.R.Civ.P.* 23 are satisfied. Further grounds and authorities for this motion are in the accompanying memorandum of law and exhibits, which are incorporated.

WHEREFORE, Representative Plaintiff respectfully requests that the Court grant final approval to the Settlement Agreement and enter the attached, comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.¹

Respectfully submitted,

/s/ Richard S. Gordon

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**Attorneys for Representative Plaintiff and the
Settlement Class**

¹The proposed Final Order Approving Settlement and Certifying Settlement Class is comprehensive, and resolves all motions filed today: this Motion, the Motion for Incentive Award, the Motion for *Cy Pres* Award, and the Motion for Award of Attorney' Fees and Expenses to Class Counsel. The same proposed Final Order will be filed with

each of these motions, pursuant to the requirement that a proposed Order be submitted with every motion.